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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

IN RE: HIGH-TECH EMPLOYEE  
ANTITRUST LITIGATION

THIS DOCUMENT RELATES TO:  
All Actions

Master Docket No. 11-CV-2509-LHK

**DECLARATION OF ANNE B. SHAVER IN  
SUPPORT OF PLAINTIFFS' REPLY IN  
SUPPORT OF SUPPLEMENTAL CLASS  
CERTIFICATION MOTION**

Date: August 8, 2013  
Time: 1:30 pm  
Courtroom: 8, 4<sup>th</sup> Floor  
Judge: Honorable Lucy H. Koh

I, Anne B. Shaver, declare:

1. I am an associate in the law firm of Lieff, Cabraser, Heimann & Bernstein, LLP, a member of the State Bar of California, and am admitted to practice before the United States District Court for the Northern District of California. I am one of the counsel for the Plaintiffs in

1 this action. I make this declaration based on my own personal knowledge. If called upon to  
2 testify, I could and would testify competently to the truth of the matters stated herein.

3 **Deposition Testimony of Defendants' Witnesses**

4 2. Attached hereto as Exhibit A is a true and correct copy of transcript excerpts from  
5 the deposition of Adobe witness Rosemary Arriada-Keiper, dated March 28, 2013.

6 3. Attached hereto as Exhibit B is a true and correct copy of transcript excerpts from  
7 the deposition of Intuit witness William Campbell, dated February 5, 2013.

8 4. Attached hereto as Exhibit C is a true and correct copy of transcript excerpts from  
9 the deposition of Pixar witness Ed Catmull, dated January 24, 2013.

10 5. Attached hereto as Exhibit D is a true and correct copy of transcript excerpts from  
11 the deposition of Apple witness Tony Fadell, dated March 20, 2013.

12 6. Attached hereto as Exhibit E is a true and correct copy of transcript excerpts from  
13 the deposition of Google witness Arnon Geshuri, dated August 17, 2012.

14 7. Attached hereto as Exhibit F is a true and correct copy of transcript excerpts from  
15 the deposition of Intel witness Danny McKell, dated March 20, 2013.

16 8. Attached hereto as Exhibit G is a true and correct copy of transcript excerpts from  
17 the deposition of Adobe witness Donna Morris, dated August 21, 2012.

18 9. Attached hereto as Exhibit H is a true and correct copy of transcript excerpts from  
19 the deposition of Intel witness Patricia Murray, dated February 14, 2013.

20 10. Attached hereto as Exhibit I is a true and correct copy of transcript excerpts from  
21 the deposition of Pixar witness Stephanie Sheehy, dated March 5, 2013.

22 11. Attached hereto as Exhibit J is a true and correct copy of transcript excerpts from  
23 the deposition of Intuit witness Mason Stubblefield, dated March 29, 2013.

24 12. Attached hereto as Exhibit K is a true and correct copy of transcript excerpts from  
25 the deposition of Google witness Frank Wagner, dated March 7, 2013.

26 **Deposition Testimony of Expert Witnesses**

27 13. Attached hereto as Exhibit L is a true and correct copy of transcript excerpts from  
28 the deposition of Plaintiffs' expert witness Kevin Hallock, dated June 7, 2013.

14. Attached hereto as Exhibit M is a true and correct copy of transcript excerpts from the deposition of Plaintiffs' expert witness Edward Leamer, dated June 11, 2013.

15. Attached hereto as Exhibit N is a true and correct copy of transcript excerpts from the deposition of Defendants' expert witness Kevin Murphy, dated December 3, 2012 (Vol. I., pp. 1-385) and July 5, 2013 (Vol. II., pp. 386-568).

16. Attached hereto as Exhibit O is a true and correct copy of transcript excerpts from the deposition of Defendants' expert witness Kathryn Shaw, dated July 3, 2013.

#### **Plaintiffs' Deposition Exhibits**

17. Attached hereto as Exhibit 122 is a true and correct copy of Plaintiffs' Exhibit 122, LUCAS00184664.

18. Attached hereto as Exhibit 1304 is a true and correct copy of Plaintiffs' Exhibit 1304, PIX00044219.

19. Attached hereto as Exhibit 2738 is a true and correct copy of Plaintiffs' Exhibit 2738, INTUIT\_043557.

20. Attached hereto as Exhibit 2739 is a true and correct copy of Plaintiffs' Exhibit 2739, INTUIT\_043560.

21. Attached here to as Exhibit 2847 is a true and correct copy of Plaintiffs' Exhibit 2847, Kathryn Shaw, *Insider Econometrics: A Roadmap with Stops Along the Way*, Labour Economics 16, 607 (2009).

22. Attached hereto as Exhibit 2854 is a true and correct copy of Plaintiffs' Exhibit 2854, Anderson, et. al., *Reaching for The Stars: Who Pays for Talent in Innovative Industries?*, National Bureau of Economic Research, Working Paper 12435 (2006).

\* \* \*

1 I declare under penalty of perjury under the laws of the United States that the foregoing is  
2 true and correct.

3 Executed July 12, 2013 in San Francisco, California.  
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5 /s/ Anne B. Shaver

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